

**REMARKS/ARGUMENTS**

Prior to the entry of this amendment, claims 1-57 were pending in this application. No claims are amended, added or canceled herein. Therefore, claims 1-57 remain pending in this application. Applicant respectfully requests reconsideration of these claims for at least the reasons presented below.

**35 U.S.C. §103 Rejection, Hassett in view of Kraenzel**

The Office Action has rejected claims 1-4 and 7-57 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,173,311 of Hassett et al. (hereinafter "Hassett") in view of U. S. Patent No. 6,854,016 of Kraenzel et al. (hereinafter "Kraenzel"). The Applicant respectfully submits that the Office Action does not establish a *prima facie* case of obviousness in rejecting these claims. Therefore, the Applicant requests reconsideration and withdrawal of the rejection.

In order to establish a *prima facie* case of obviousness, the Office Action must establish: 1) some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or combine their teachings; 2) a reasonable expectation of success of such a modification or combination; and 3) a teaching or suggestion in the cited prior art of each claimed limitation. See MPEP §706.02(j).

As will be discussed below, the references cited by the Office Action do not teach or suggest each claimed limitation. The Office Action does not provide evidence that the suggestion or motivation to modify or combine the references cited is explicit or implicit in the references cited. Further, the Office Action does not provide any evidence that knowledge of one skilled in the art would provide the suggestion or motivation to modify these references.

Finally, the Office Action does not provide evidence of a reasonable expectation of success of such a modification or combination.

Hassett is directed to "servicing of client requests on a network." (Col. 1, lines 15-16) Under Hassett, "HTTP GET requests from client computers are served by assigned agents on the caching proxy server." (Col. 7, lines 13-15) "When a GET request is received by the caching proxy server, the category id of the request is examined to determine which agent on the caching proxy server should serve the request." (Col. 7, line 29-32) That is, under Hassett, the agent used to process a request is determined by information (i.e., the category ID) in the request, from the client. (See also FIG. 5A) The category ID from the request is based on the last information sent to the client. (Col. 5, lines 35-36, col. 9, lines 9-33, col. 19, line 10 - col. 22, line 35) However, Hassett does not teach or suggest multiple data stores each with an associated agent and profile representing configuration information for the data store or accessing a data store via the associated agent based on the profiles.

Kraenzel is directed to "a trust model for authorizing download based upon server site authentication." (Col. 1, lines 45-46) More specifically, Kraenzel teaches "a web based trust model governing delivery of services and programs from a workflow, enterprise and mail-enabled application server and platform." (Col. 2, lines 41-43) A connection protocol connects a user client to a server site and download utilities that, responsive to the connection protocol, download the services and programs from the server site to the user client. (Col. 2, lines 43-46) Kraenzel describes 3 such models including an "On Line Services Model" (col. 4, line 62 - col. 5, line 30), a "Local Run Time Model" (col. 5, line 31 - col. 6, line 67), and a "Client Local Replica Model" (col. 7, lines 1-62). In the On Line Services Model, "the highest level of security is managed through a database access control list (ACL)." (Col. 5, lines 24-29) In the Local Run Time Model, access is controlled through the security model that "includes ACL protection of databases, and may also provide controls for access to documents." (Col. 5, line 62 - col. 6, line 10) In this model, an agent model for triggering agents is subject to the access provided by the

security model. (Col. 6, lines 50-56) Finally, in the Client Local Replica Model, "agents are stand-alone programs that perform a specific task in one or more databases, and as databases are under access control library (ACL) security." (Col. 7, lines 33-35)

Therefore, regardless of the trust model, Kraenzel teaches providing access to data stores based on an ACL and does not teach or suggest multiple data stores each with an associated agent and profile representing configuration information for the data store or accessing a data store via the associated agent based on the profiles. The agents of Kraenzel do not access the database based on a profile but rather perform specific tasks within the limitations of the access provided by other elements of the system, such as the security model, based on the ACL.

Claim 1, upon which claims 2-4 and 7-17 depend, relate to a method of supporting multiple data stores for an integrated access system and identity system. Claim 35, upon which claims 36-39 depend, relates to one or more processor readable storage devices having processor readable code embodied on said processor readable storage devices, said processor readable code for programming one or more processors to perform a method. Both claim 1 and claim 35 recite in part "receiving a request at said integrated access system and identity system, said integrated access system and identity system supporting a plurality of data stores, each data store associated with an agent and a profile representing configuration information for the data store; accessing based on the profiles one or more of said data stores via the agent for the one or more data stores in response to said request." Neither Hassett nor Kraenzel, alone or in combination, teaches or suggests a plurality of data stores, each data store associated with an agent and a profile representing configuration information for the data store and accessing, based on the profiles, one or more of said data stores via the agent. Rather, Hassett teaches determining an agent to process a request based on information (i.e., the category ID) in the request, the information in the request based on the last information sent to the client while Kraenzel teaches providing access to data stores based on an ACL. For at least these

reasons, the Applicant requests that the rejection be withdrawn and claims 1-4, 7-17, and 35-39 allowed.

Claim 18, upon which claims 19-27 depend, relates to a method of supporting multiple data stores. Claim 40, upon which claims 41-45 depend, relates to one or more processor readable storage devices having processor readable code embodied on said processor readable storage devices, said processor readable code for programming one or more processors to perform a method. Both claim 18 and claim 40 recite in part "receiving a request to access one or more of a plurality of data stores, each data store having a profile representing configuration information for the data store; determining based on the profiles which data stores can service said request, each data store is associated with a separate agent; accessing said data stores that can service said request by communicating with said associated agents." Neither Hassett nor Kranenzel, alone or in combination, teaches or suggests a plurality of data stores, each data store associated with an agent and a profile representing configuration information for the data store and accessing, based on the profiles, one or more of said data stores via the agent. Rather, Hassett teaches determining an agent to process a request based on information (i.e., the category ID) in the request, the information in the request based on the last information sent to the client while Kraenzel teaches providing access to data stores based on an ACL. For at least these reasons, the Applicant requests that the rejection be withdrawn and claims 18-27 and 40-45 allowed.

Claim 28, upon which claims 29-34 depend, relates to a method of supporting multiple data stores. Claim 46, upon which claims 47-49 depend, relates to one or more processor readable storage devices having processor readable code embodied on said processor readable storage devices, said processor readable code for programming one or more processors to perform a method. Claim 50, upon which claims 51-54 depend, relates to an apparatus that supports multiple data stores. Claims 28, 46, and 50 recite in part "receiving a request to access one or more of a plurality of data stores, each data store having a profile representing

configuration information for the data store; determining based on the profiles which data stores can service said request; creating a proxy having knowledge of which data stores can service said request; using said proxy to access said data stores that can service said request." Neither Hassett nor Kraenzel teaches or suggests, alone or in combination, each data store having a profile representing configuration information for the data store and determining based on the profiles which data stores can service a request or creating a proxy having knowledge of which data stores can service a request. For at least these reasons, the Applicant requests that the rejection be withdrawn and claims 28-34 and 46-54 allowed.

Claim 55, upon which claims 56 and 57 depend, relates to a system that supports multiple data stores. Claim 55 recites in part "a set of profiles, each profile associated with one of said data stores; a set of agents, each agent associated with one of said data stores; a temporary proxy; and a database manager, said database manager in communication with said profiles, said database manager creates said proxy in response to a request to access said data stores, said database manager caused said proxy to be in communication with agents associated with data stores that can service said request based on the profiles." Neither Hassett nor Kraenzel teaches or suggests, alone or in combination, a set of profiles, each profile associated with one of said data stores; a set of agents, each agent associated with one of said data stores; a temporary proxy; and a database manager, said database manager in communication with said profiles, said database manager creates said proxy in response to a request to access said data stores, said database manager caused said proxy to be in communication with agents associated with data stores that can service said request based on the profiles. Rather, Hassett teaches determining an agent to process a request based on information (i.e., the category ID) in the request, the information in the request based on the last information sent to the client while Kraenzel teaches providing access to data stores based on an ACL. For at least these reasons, the Applicant requests that the rejection be withdrawn and claims 55-57 allowed.

**35 U.S.C. §103 Rejection, Hassett and Kraenzel in view of Brown**

The Office Action has rejected claims 5 and 6 under 35 U.S.C. §103(a) as being unpatentable over Hassett and Kraenzel in view of Brown et al., U. S. Patent No. 6,678,733 (hereinafter Brown). The Applicant respectfully submits that the Office Action does not establish a *prima facie* case of obviousness in rejecting these claims. Therefore, the Applicant requests reconsideration and withdrawal of the rejection.

As discussed in detail above, claim 1, upon which claims 5 and 6 depend, is distinguishable from the combination of Hassett and Kraenzel since neither reference, alone or in combination teaches or suggests a plurality of data stores, each data store associated with an agent and a profile representing configuration information for the data store and accessing based on the profiles one or more of said data stores via the agent.

Brown is directed to " a method and system that authenticates users and authorizes the users to access a walled garden of network services." (Col. 2, lines 15-17) Under Brown " When a user wishes to access a service in the walled garden, the client sends a hypertext transport protocol (HTTP) request to the WGPS identifying the plot number of the requested service. If the client has a ticket granting access to the walled garden, the client includes the ticket in an authorization header." (Col. 2, line 66 - col. 3, line 4) " In response to a denial, the client sends a message to the GS requesting a ticket. The user authenticates himself or herself to the client by providing authentication information and the client provides this information to the GS." (Col. 3, lines 7-10) That is, Brown provides access to controlled resources based on a ticket or key provided by a client. However, Brown does not teach or suggest a plurality of data stores, each data store associated with an agent and a profile representing configuration information for the data store; accessing based on the profiles one or more of said data stores via the agent.

Appl. No. 09/998,908  
Amdt. dated: October 18, 2005  
Amendment under 37 CFR 1.116 Expedited Procedure  
Examining Group 2144

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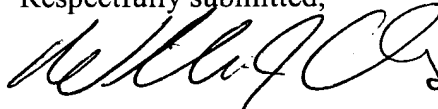
The combination of Hassett, Kraenzel and Brown is no more relevant to the pending claims than either reference alone. None of the references, alone or in combination, teach or suggest a plurality of data stores, each data store associated with an agent and a profile representing configuration information for the data store; accessing based on the profiles one or more of said data stores via the agent. Therefore, the references cited in the Office Action fail to teach or suggest each claimed limitation. For at least these reasons, claims 5 and 6 should be allowed.

### CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,



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